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**From:** Bird, Patrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8376934BF605424D8E870C10744090EC-BIRD, PATRICK]  
**Sent:** 2/15/2022 3:50:41 PM  
**To:** John Cossa [john.cossa@fpisc.gov]  
**Subject:** Extension of South Fork OCS Air Permit Final Completion Date

Hi John,

Do you have a pdf copy of the signed approval to extend EPA's final permit issuance deadline for the OCS air permit to January 18, 2022? I have a recollection of seeing this version, but I cannot find it in my records.

Thanks,

Pat

Patrick Bird  
US EPA Region 1  
5 Post Office Square, 05-2  
Boston, MA 02109  
p: 617-918-1287  
e: bird.patrick@epa.gov

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**From:** Bird, Patrick  
**Sent:** Tuesday, October 12, 2021 1:55 PM  
**To:** John Cossa <john.cossa@fpisc.gov>  
**Cc:** Rudnick, Barbara <Rudnick.Barbara@epa.gov>; Bowles, Scott <Bowles.Scott@epa.gov>; Timmermann, Timothy <Timmermann.Timothy@epa.gov>; Boatman, Mary C <Mary.Boatman@boem.gov>; Kipka, Undine <kipka.undine@epa.gov>; Christine Harada <christine.harada@fpisc.gov>; Tabitha Elkington <tabitha.elkington@fpisc.gov>; Jennifer Mallard <jennifer.mallard@fpisc.gov>  
**Subject:** RE: Draft ED Determination re Extension of South Fork OCS Air Permit Final Completion Date

Hi all,

Just to close the loop, John and I had a chance to talk earlier today. He is going to route for signature but hold publication on the dashboard until after our Oct 20 publication of the revised draft. We'll also share the revised draft permit and fact sheet with the applicant in advance of publication (a common practice in air permitting).

Thanks,

Pat

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**From:** John Cossa <john.cossa@fpisc.gov>  
**Sent:** Tuesday, October 12, 2021 11:11 AM  
**To:** Bird, Patrick <Bird.Patrick@epa.gov>  
**Cc:** Rudnick, Barbara <Rudnick.Barbara@epa.gov>; Bowles, Scott <Bowles.Scott@epa.gov>; Timmermann, Timothy <Timmermann.Timothy@epa.gov>; Boatman, Mary C <Mary.Boatman@boem.gov>; Kipka, Undine <kipka.undine@epa.gov>; Christine Harada <christine.harada@fpisc.gov>; Tabitha Elkington <tabitha.elkington@fpisc.gov>; Jennifer Mallard <jennifer.mallard@fpisc.gov>  
**Subject:** Re: Draft ED Determination re Extension of South Fork OCS Air Permit Final Completion Date

Thank you, Pat. Just left you a VM. This looks good to us. I would like to quickly close the loop with you re our discussion with the PS before issuing the opinion. Best,

John

On Tue, Oct 12, 2021 at 6:49 AM Bird, Patrick <[Bird.Patrick@epa.gov](mailto:Bird.Patrick@epa.gov)> wrote:

Hi John,

It appears Undine's original response did not go out to you and your FPISC team. I'm sending along her Thursday response to you and all intended recipients. Undine is out this week, so if you have any comments/questions/suggestions on our proposed edits below, feel free to reach out to me.

Thanks,

Pat

Patrick Bird

US EPA Region 1

5 Post Office Square, 05-2

Boston, MA 02109

p: 617-918-1287

e: [bird.patrick@epa.gov](mailto:bird.patrick@epa.gov)

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**From:** Kipka, Undine <[kipka.undine@epa.gov](mailto:kipka.undine@epa.gov)>

**Sent:** Thursday, October 7, 2021 5:53 PM

**Cc:** Rudnick, Barbara <[Rudnick.Barbara@epa.gov](mailto:Rudnick.Barbara@epa.gov)>; Bowles, Scott <[Bowles.Scott@epa.gov](mailto:Bowles.Scott@epa.gov)>; Timmermann, Timothy <[Timmermann.Timothy@epa.gov](mailto:Timmermann.Timothy@epa.gov)>; Boatman, Mary C <[Mary.Boatman@boem.gov](mailto:Mary.Boatman@boem.gov)>; Bird, Patrick <[Bird.Patrick@epa.gov](mailto:Bird.Patrick@epa.gov)>

**Subject:** RE: Draft ED Determination re Extension of South Fork OCS Air Permit Final Completion Date

John,

Thanks for the opportunity to review the draft determination. We really appreciate you putting this together. We have a few comments and suggestions. Please see below.

1. We recommend Section III to be revised consistent with the following language:

The EPA issues air permits for OCS wind energy projects pursuant to Section 328 of the Clean Air Act, 42 U.S.C. § 7627, and implementing regulations at 40 C.F.R. part 55, which provide for public comment on EPA proposed OCS air permit conditions prior to permit issuance. On June 24, 2021, EPA published a notice on its website (see <https://www.epa.gov/caa-permitting/caa-public-comment-opportunities-region-1>), as well as in the Boston Globe, New Bedford Times, and Providence Journal newspapers, seeking public comment on proposed OCS air permit conditions for the South Fork Wind Farm project, which included proposed requirements for the developer to secure emission offsets for construction-based and operations-based emissions. EPA has since revised its proposed permit to require offsets only for operations-based emissions. On October 20, 2021, EPA opened a 45-day public comment period on its revised proposed permit through publication of a second public notice on its website (see <https://www.epa.gov/caa-permitting/caa-public-comment-opportunities-region-1>), as well public notices in the Boston Globe, New Bedford Times, and Providence Journal newspapers. EPA anticipates deciding on the issuance of the OCS air permit on the South Fork Wind Farm project by January 18, 2022.

2. The above edits speak to a comment on sequencing between the finalization of this approval and the issuance of EPA's revised draft/proposed permit. The public will be made aware of EPA's intent to revise the permit on October 20, 2021. Could this approval be sequenced such that signature occurs after the 20<sup>th</sup>? The above revised Section III is written with that intent.
3. Also, with respect to the June 24, 2021 public participation milestone, I believe there is a misunderstanding concerning whether that date was met or missed. EPA is under the impression the milestone was met, as the public participation period started on that date. For that reason, we recommend deleting footnote comment #2.

With regards to my schedule, I'll be out tomorrow (10/8) and next week, but my supervisor in EPA Region 1, Patrick Bird, will be able to follow up with you in the meantime. Pat (copied) can be reached by email and at (617) 918 1287.

Undine Kipka

(617) 918 1335

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**From:** John Cossa <[john.cossa@fpisc.gov](mailto:john.cossa@fpisc.gov)>  
**Sent:** Thursday, October 7, 2021 10:13 AM  
**To:** Kipka, Undine <[kipka.undine@epa.gov](mailto:kipka.undine@epa.gov)>  
**Cc:** Rudnick, Barbara <[Rudnick.Barbara@epa.gov](mailto:Rudnick.Barbara@epa.gov)>; Bowles, Scott <[Bowles.Scott@epa.gov](mailto:Bowles.Scott@epa.gov)>; Timmermann, Timothy <[Timmermann.Timothy@epa.gov](mailto:Timmermann.Timothy@epa.gov)>; Boatman, Mary C <[Mary.Boatman@boem.gov](mailto:Mary.Boatman@boem.gov)>; Bird, Patrick <[Bird.Patrick@epa.gov](mailto:Bird.Patrick@epa.gov)>  
**Subject:** Re: Draft ED Determination re Extension of South Fork OCS Air Permit Final Completion Date

Excellent, thank you, Undine!

John

On Thu, Oct 7, 2021 at 9:41 AM Kipka, Undine <[kipka.undine@epa.gov](mailto:kipka.undine@epa.gov)> wrote:

Hi John,

EPA Region 1 is looking into getting you in the missing information and will get back to you shortly.

Undine Kipka

(617) 918 1335

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**From:** John Cossa <[john.cossa@fpisc.gov](mailto:john.cossa@fpisc.gov)>  
**Sent:** Thursday, October 7, 2021 3:34 AM  
**To:** Tomiak, Robert <[tomiak.robert@epa.gov](mailto:tomiak.robert@epa.gov)>; Rudnick, Barbara <[Rudnick.Barbara@epa.gov](mailto:Rudnick.Barbara@epa.gov)>; Bowles, Scott <[Bowles.Scott@epa.gov](mailto:Bowles.Scott@epa.gov)>; Timmermann, Timothy <[Timmermann.Timothy@epa.gov](mailto:Timmermann.Timothy@epa.gov)>; Kipka, Undine <[kipka.undine@epa.gov](mailto:kipka.undine@epa.gov)>  
**Cc:** Christine Harada <[christine.harada@fpisc.gov](mailto:christine.harada@fpisc.gov)>; Tabitha Elkington <[tabitha.elkington@fpisc.gov](mailto:tabitha.elkington@fpisc.gov)>; Jennifer Mallard <[jennifer.mallard@fpisc.gov](mailto:jennifer.mallard@fpisc.gov)>; Meredith Cody <[meredith.cody@fpisc.gov](mailto:meredith.cody@fpisc.gov)>; Boatman, Mary C <[Mary.Boatman@boem.gov](mailto:Mary.Boatman@boem.gov)>  
**Subject:** Draft ED Determination re Extension of South Fork OCS Air Permit Final Completion Date

EPA Team -

As requested by BOEM and EPA, I have attached for your review a draft Executive Director determination, pursuant to 42 U.S.C. 4370m-2(c)(2)(D)(i)(III), re BOEM's request to extend the final completion date for EPA's OCS air permit action for the South Fork Wind Farm and South Fork Export Cable by more than 30 days.

Please provide the missing information highlighted in the text, and ensure that our recitation of the facts and particulars of EPA's proposed administrative action are accurate (apologies if they are not -- although we discussed the matter with EPA staff, we did not receive a written description of the proposed administrative action).

Please let us know if you have any questions or would like to discuss.

Best,

John

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**John G. Cossa**

General Counsel

Federal Permitting Improvement Steering Council

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